

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JOHN GARLAND, et al., on behalf of themselves and all
other similarly situated employees of the New
York City Fire Department,

Plaintiffs,

- against -

NEW YORK CITY FIRE DEPARTMENT, DANIEL A.
NIGRO, in his official and individual capacities, JOHN
DOE #1-10, in their official and individual capacities; and
JANE DOE #1-10 in their official and individual capacities,

Defendants.
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**SUPPLEMENTAL
DECLARATION OF
ANDREA O’CONNOR IN
OPPOSITION TO
PLAINTIFFS’
APPLICATION FOR A
PRELIMINARY
INJUNCTION**

No. 21 Civ 6586 (KAM)(CP)

ANDREA O’CONNOR declares, pursuant to 28 U.S.C. § 1746 and subject to the penalties of perjury, that the following is true and correct:

1. I am an Assistant Corporation Counsel in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, attorney for Defendants New York City Fire Department (“FDNY”) and Daniel Nigro (collectively “FDNY Defendants”) and as such I am familiar with the facts as set forth herein.

2. FDNY Defendants respectfully request that, despite being submitted after the deadline for FDNY Defendants’ responsive papers, the Court consider this supplemental declaration and the affidavits annexed hereto in connection plaintiffs’ application for a preliminary injunction.

3. Attached hereto as Exhibit “K” is the affidavit of Tricia Singh, dated November 30, 2021.

4. Also attached hereto as Exhibit “L” is the affidavit of Mario Manna, dated November 30, 2021.

Dated: New York, New York
November 30, 2021

GEORGIA M. PESTANA
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City of New York
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By: /s/
Andrea O'Connor
Assistant Corporation Counsel